

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MOBILOC, LLC

Plaintiff,

v.

NEUTRON HOLDINGS INC., dba LIME,

Defendant.

CASE NO. 2:20-cv-1570

COMPLAINT FOR PATENT
INFRINGEMENT

JURY TRIAL DEMANDED

Plaintiff Mobiloc LLC, for its complaint against Defendant Neutron Holdings Inc. dba Lime, alleges as follows:

NATURE OF LAWSUIT AND JURISDICTION

1. This action involves claims for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has exclusive jurisdiction over the subject matter of the Complaint under 28 U.S.C. § 1338(a).

THE PARTIES AND VENUE

2. Plaintiff Mobiloc, LLC (“Mobiloc”) is an Illinois limited liability company with its principal place of business at 5800 West 117th Place, Alsip, Illinois 60803. Mobiloc is the assignee of United States Patent No. 8,854,207 (“the ‘207 patent”). Mobiloc owns all right, title and interest in, and has standing to sue for infringement of the ‘207 patent, entitled “Mobile Lock

1 with Retractable Cable,” issued on October 7, 2014. A copy of the ‘207 patent is attached as
2 Exhibit 1.

3 3. Defendant Neutron Holdings Inc. dba Lime (“Lime”) is a Delaware corporation
4 with a principal place of business located at 85 Second Street, Suite 100, San Francisco, California
5 94105. Defendant Lime transacts business, uses and offers for rental products that infringe the
6 asserted patent in this judicial district.

7 4. Venue is proper in this District under 28 U.S.C. § 1391 because a substantial part
8 of the events or omissions giving rise to the claim occurred in this District and a substantial part of
9 the property that is the subject of the action is situated in this District. Venue is further proper
10 under 28 U.S.C. § 1400(b) because the Defendant has committed acts of infringement and has a
11 regular and established place of business in this District, namely, a facility where the infringing
12 products are stored and maintained.

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BACKGROUND

5. Lime operates fleets of electric bikes (“e-bikes”) that it makes available for rental by users through a mobile phone application. An example of a Lime e-bike is shown below.



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1 6. One model of e-bikes used and offered for rental by Lime is the JUMP e-bike,
2 shown below.



14 7. One model of the JUMP e-bike includes a retractable cable, as shown below.



1 8. On information and belief, the Jump e-bike with the retractable cable is referred to
2 as the Model 5.5 JUMP e-bike.

3 9. The JUMP e-bike with the retractable cable has been used and operated in Seattle.

4 10. The JUMP e-bike 5with the retractable cable is available for rental in Seattle, as
5 shown in the photograph below.



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21 11. The location of a JUMP e-bike with the retractable cable may be determined from
22 electronic components on board the bike.

23 **COUNT I**
24 **DIRECT INFRINGEMENT OF THE '207 PATENT**

25 12. Plaintiff incorporates by reference the allegations of Paragraph 1-11.
26

13. Lime has directly infringed at least claim 1 of the '207 patent by, among other activities, making, using, selling, offering for sale and renting the JUMP e-bike with the retractable cable, referred to below as the JUMP e-bike 5.5.

14. Among other elements, Claim 1 of the '207 patent claims a mobile lock with a retractable cable and a location component that allows for the mobile lock to be located in real-time.

15. The JUMP e-bike 5.5 includes a mobile lock with a retractable cable and a location component that allows for the mobile lock to be located in real-time.

16. Referring to specific elements of Claim 1 of the '207 patent, the JUMP e-bike 5.5 includes a mobile lock.

17. The JUMP e-bike 5.5 includes a retractable cable that retracts into a housing attached to the bike.

18. The housing for the JUMP e-bike 5.5 is identified by the yellow arrow below.

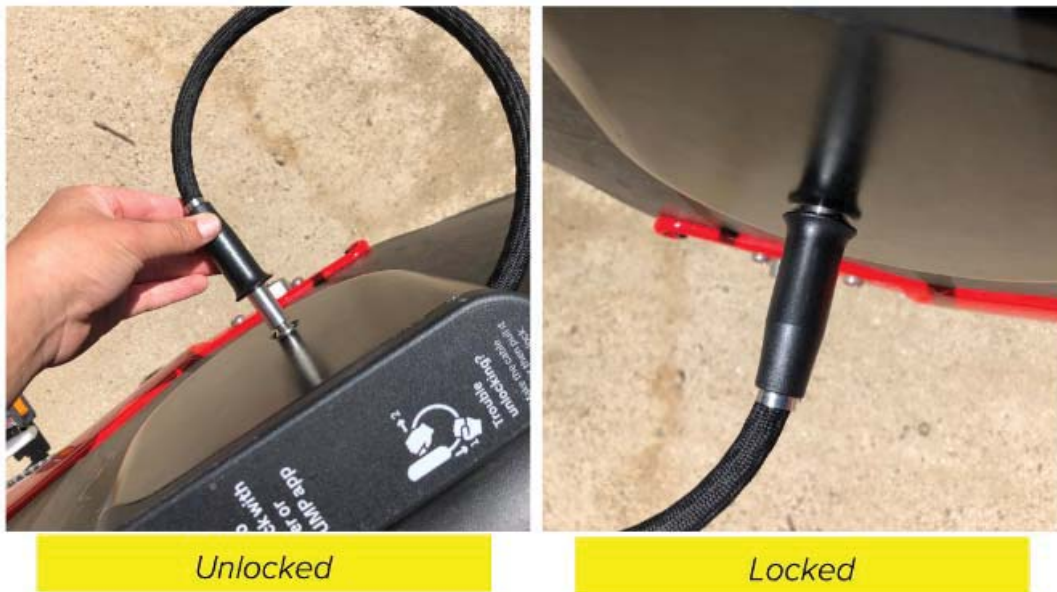


19. The JUMP e-bike 5.5 includes a retractable cable used to lock the bike when the bike is not in use.

20. The JUMP e-bike 5.5 includes a retractable cable with a metal device on one end of the cable, as identified by the yellow arrow below.



21. When the cable is retracted from the housing, the metal device at the end of the retractable cable may be inserted into the side of the component holding the cable, as shown below, to lock the cable to the bike.



22. The JUMP e-bike 5.5 retractable cable includes a cable lock end that is insertable securely into a cable attaching component, the cable attaching component integral with the housing attached to the bike, as shown below.



23. The housing for the retractable cable is attached to the JUMP e-bike 5.5.

24. The JUMP bike includes a cable unlocking component for unlocking the lock end from the attaching component, as shown below.



25. The retractable cable of the Jump e-bike 5.5 is used to secure the bike to solid objects.

26. The JUMP e-bike 5.5 may be located in real-time by Lime.

27. The JUMP e-bike 5.5 includes a component that allows the bike to be located in real-time.

28. The housing for the retractable cable of the JUMP e-bike 5.5 includes a component that allows the bike to be located in real-time.

29. The component that allows for the JUMP e-bike 5.5 to be located in real-time wirelessly communicates with a communication network.

1 30. The JUMP e-bike 5.5 includes circuitry in the housing for the retractable cable that
2 provides the real-time physical location of the bike by communicating with a wireless network.

3 31. The circuitry of the JUMP e-bike 5.5 that provides for the real-time physical
4 location of the bike includes a non-transitory memory, a baseband transceiver or ultra-wideband
5 transceiver, a wireless RF antenna, a processor, a security interface, an internal power source, an
6 accelerometer, and a GPS location chip set.

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8 **PRAYER FOR RELIEF**

9 THEREFORE, Plaintiff asks this Court to enter a judgement against Lime, and against its
10 subsidiaries, affiliates, agents, servants, employees and all persons in active concert or
11 participation with them, granting the following relief:

12 A. An award of lost profit and/or reasonable royalty damages adequate to compensate
13 Plaintiff for the infringement that has occurred, together with prejudgment interest from the date
14 that Defendant's infringement of the Plaintiff's patent began;

15 B. Increased damages as permitted under 35 U.S.C. § 284;

16 C. A finding that this case is exceptional and an award to Plaintiffs of their attorneys'
17 fees and costs as provided by 35 U.S.C. § 285;

18 D. A permanent injunction prohibiting further infringement of the asserted patents;
19 and

20 E. Such other and further relief as this Court or a jury may deem proper and just in
21 and in equity including royalties on future sales.

22 **JURY DEMAND**

23 Plaintiff demands a trial by jury on all issues presented in this Complaint.
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1 DATED this 23rd day of October, 2020.

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